

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Integrated Health Services, Inc., *et al.*

Case No. 00-389 (MFW)
Jointly Administered

Debtors.

IHS LIQUIDATING LLC,
Plaintiff,

v.

Civil Action No. 05-376
(GMS)

ACE INDEMNITY INSURANCE COMPANY
f/k/a INDEMNITY INSURANCE COMPANY OF
NORTH AMERICA,

Defendant.

IHS LIQUIDATING LLC,

Civil Action No. 04-1262 (GMS)

Third Party Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE COMPANY
OF PITTSBURGH, PA, GENERAL STAR
INDEMNITY COMPANY and ACE INDEMNITY
INSURANCE COMPANY f/k/a INDEMNITY
INSURANCE COMPANY OF NORTH AMERICA

Third-Party Defendants.

ACE INDEMNITY INSURANCE COMPANY
f/k/a INDEMNITY INSURANCE COMPANY OF
NORTH AMERICA,

Third-Party Defendant and
Fourth-Party Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA, and
GENERAL STAR INDEMNITY COMPANY,

Fourth-Party Defendants.

NOTICE OF DEPOSITION

TO: Francis J. Deasey, Esq. Deasey, Mahoney & Bender, Ltd. 1800 John F. Kennedy Boulevard Suite 1300 Philadelphia, PA 19103-2978	Benjamin C. Wetzel, III, Esq. 1100 North Grant Avenue Suite 201 Wilmington, DE 19805
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PLEASE TAKE NOTICE that third-party defendant/fourth-party defendant, National Union Fire Insurance Co. of Pittsburgh, PA (National Union) will take the deposition of the defendant/third-party defendant/fourth-party plaintiff ACE Indemnity Insurance Company f/k/a Indemnity Insurance Company of North America (IICNA), pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure at 10:00 a.m., on Tuesday, June 5, 2007, at the offices of IICNA Westchester Specialty Group, 500 Colonial Center Parkway, Suite 200, Roswell, GA 30076, before a notary or other competent authority authorized to administer oaths. The examination will continue from day to day until completed. The testimony shall be recorded by stenographic means.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, IICNA shall designate one or more of its officers, directors, or managing agents, or such other persons who consent to testify on its behalf, to testify about the following matters:

1. IICNA's receipt, investigation, handling, adjustment and disposition of liability claims made against Integrated Health Services, Inc., and against Integrated Health Services of Lester, Inc.;

2. The investigation and formation of, and bases for, IICNA's claim that the policy of insurance issued by National Union to Integrated Health Services, covering the period from January 1, 1999 to January 1, 2000 is not properly exhausted;

3. The investigation and formation of, and bases for, IICNA's claim that the policy of insurance issued by National Union to Integrated Health Services, covering the period from January 1, 2000 to January 1, 2002 is not properly exhausted;

4. The underwriting of the policy of insurance issued by IICNA to Integrated Health Services Inc. for the period from January 1, 1999 to January 1, 2000;

5. The underwriting of the policy of insurance issued by IICNA to Integrated Health Services Inc. for the period from January 1, 2000 to January 1, 2001;

6. IICNA's receipt, access to, review, auditing, maintenance, storage, and/or destruction of original files reflecting the handling of liability claims against Integrated Health Services, Inc., and against Integrated Health Services of Lester, Inc.

Dated: May 31, 2007
Wilmington, Delaware

CROSS & SIMON, LLC

By: /s/ Christopher P. Simon
Christopher P. Simon (No. 3697)
913 North Market Street, 11th Floor
Wilmington, DE 19899-1380
(302) 777-4200
(302) 777-4224 (facsimile)

-and-

Gwynne A. Young, Esq.
Carlton Fields, LLP
4221 W. Boy Scout Boulevard
Tampa, FL 33607-5736
(813) 229-4333
(813) 229-4133 (facsimile)

-and-

George G. Campion, Esq.
WEINER LESNIAK, LLP
629 Parsippany Road
Parsippany, NJ 07054-0438
(973) 403-1100
(973) 403-0010 (facsimile)

Counsel for National Union Fire Insurance
Company of Pittsburgh, PA